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INNOVATIVE ENGINEERING SYSTEMS, INC.
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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 AGILENT TECHNOLOGIES, INC., a
Delaware corporation,

15 Plaintiff,

16 v.

17 INNOVATIVE ENGINEERING
18 SYSTEMS, INC., d/b/a AGILITECH, a
California corporation,

19 Defendant.
20

CASE NO. 4:22-cv-04162-HSG

**JOINT STIPULATION TO MODIFY CASE
SCHEDULE**

STIPULATION

Plaintiff Agilent Technologies, Inc. (“Agilent” or “Plaintiff”) and Defendant Innovative Engineering Systems, Inc., d/b/a Agilitech (“Agilitech” or “Defendant”), by and through the parties’ respective attorneys, hereby submit this stipulation regarding the case schedule as follows:

1. On January 27, 2023, the parties participated in an all-day mediation session, and based on the progress made towards settlement, the parties have scheduled a second session with the mediator on February 22, 2023.

2. In the interest of avoiding unnecessary litigation expense, the parties request a 90-day extension of the case management deadlines while they continue to pursue settlement.

3. In light of the foregoing, the parties respectfully request that the Court modify the current case schedule as follows:

Event	Current Deadline	Proposed Deadline
Close of Fact Discovery	April 28, 2023	July 27, 2023
Exchange of Opening Expert Reports	May 31, 2023	August 29, 2023
Exchange of Rebuttal Expert Reports	June 30, 2023	September 28, 2023
Close of Expert Discovery	July 31, 2023	October 30, 2023
Dispositive Motion Hearing Deadline	September 21, 2023	December 20, 2023
Pretrial Conference	December 12, 2023	March 20, 2024
Jury Trial (5 days)	January 8, 2024	April 8, 2024

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: February 17, 2023

PERKINS COIE LLP

By: /s/ Thomas L. Holt

Thomas L. Holt
Attorneys for Plaintiff
AGILENT TECHNOLOGIES, INC.

Dated: February 17, 2023

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

John V. Picone III
Jeffrey M. Ratinoff
Lynn M. Humphreys
Attorneys for Defendant
INNOVATIVE ENGINEERING
SYSTEMS, INC. dba AGILITECH

IT IS SO ORDERED.

Dated: _____, 2023

HAYWOOD S. GILLIAM, JR.
United States District Court Judge

ATTESTATION OF E-FILED SIGNATURE

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a “conformed” signature (/s/) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: February 17, 2023

HOPKINS & CARLEY
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

John V. Picone III
Jeffrey M. Ratinoff
Lynn M. Humphreys
Attorneys for Defendant
INNOVATIVE ENGINEERING
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